

RICHARD A. HARRIS, ESQ.
Nevada State Bar No. 505
JOSHUA R. HARRIS, ESQ.
Nevada State Bar No. 9580
RICHARD HARRIS LAW FIRM
801 S FOURTH ST.
LAS VEGAS NV 89101
Ph: (702) 444-4392
Fax: (702) 444-4455
Email: josh@richardharrislaw.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TEA CISNEROS-DYSTHE,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL
SECURITY,

Defendant.

Case No. 2:17-cv-02143-RFB-GWF

**PLAINTIFF'S UNOPPOSED
MOTION FOR EXTENSION OF
TIME TO FILE MOTION FOR
REMAND AND/OR REVERSAL
(FIRST REQUEST)**

IT IS HEREBY STIPULATED, by and between TEA CISNEROS-DYSTHE (Plaintiff) and NANCY A. BERRYHILL, Acting Commissioner of Social Security (Defendant), by and through their respective counsel of record, that Plaintiff shall have an extension of time to deliver the **MOTION FOR REMAND AND/OR REVERSAL**.

The current due date is December 27, 2017. The new due date will be January 26, 2018. The parties further stipulate that all other dates will be extended accordingly, and Defendant's response will be due to Plaintiff by February 25, 2018.

This is the first extension of time requested by Plaintiff in the above-captioned matter. Plaintiff requests this extension because the Appellate Attorney Writer is ill to the extent her vision is affected and she therefore cannot effectively write. This request is made in good faith with no intention to unduly delay the proceedings. Counsel for Plaintiff has conferred with Defendant's counsel, who had no opposition to this motion on December 26, 2017.

1 It is therefore respectfully requested that Plaintiff be granted a thirty (30) day
2 extension of time to file the **MOTION FOR REMAND AND/OR REVERSAL** up to
3 and including January 26, 2018.

4 DATED this 26th day of December 2017.

5 /s/ Richard A. Harris

6 **RICHARD A. HARRIS, ESQ.**

7 Nevada State Bar No. 505

8 RICHARD HARRIS LAW FIRM

9 801 S FOURTH ST.

10 LAS VEGAS NV 89101

11 Ph: (702) 444-4392

12 Fax: (702) 444-4455

13 Email: rick@richardharrislaw.com

14 Attorney for Plaintiff

DATED this 26th day of December 2017.

/s/ Richard M. Rodriguez

(As authorized via email 12/26/17 10:02am)

MARK E WOOLF

United States Attorney

RICHARD M. RODRIGUEZ

Special Assistant United States Attorney

Attorneys for Defendant

15 IT IS SO ORDERED.

16 
17 THE HONORABLE GEORGE FOLEY, JR.
18 UNITED STATES MAGISTRATE JUDGE

19 DATE: December 27, 2017
20 _____
21
22
23
24
25
26
27
28